## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b) BROWN RUDNICK LLP HAYNES AND BOONE, LLP Kenneth J. Aulet, Esq. (admitted pro hac vice) Richard S. Kanowitz, Esq. (NJ Bar No. 047911992) Seven Times Square Lauren M. Sisson, Esq. (NJ Bar No. 394182022) New York, New York 10036 30 Rockefeller Plaza, 26th Floor (212) 209-4800 New York, New York 10112 kaulet@brownrudnick.com (212) 659-7300 richard.kanowitz@haynesboone.com **BROWN RUDNICK LLP** lauren.sisson@haynesboone.com Tristan Axelrod, Esq. (admitted *pro hac vice*) One Financial Center Attorneys for the Plan Administrator Boston, MA 02111 (617)856-8300 taxelrod@brownrudnick.com General Counsel for the Plan Administrator GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 (973) 230-2095 DStolz@genovaburns.com DClarke@genovaburns.com Local Counsel for the Plan Administrator In re: Chapter 11 BLOCKFI INC., et al., Case No. 22-19361 (MBK) Debtors.1 (Jointly Administered under a Confirmed Plan<sup>2</sup>) Hearing Date: August 15, 2024 at 11:30 a.m. ET

## NOTICE OF WIND-DOWN DEBTORS' MOTION FOR AUTHORITY TO REDACT AND FILE CERTAIN INFORMATION UNDER SEAL IN CONNECTION WITH THE WIND-DOWN DEBTORS' MOTION TO APPROVE KYC/ALM PROTOCOLS FOR US-BASED ACCOUNTS

\_

The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

On October 3, 2023, the Court entered an order confirming the *Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications)* (the "Plan") [Docket No. 1609]. Capitalized terms not otherwise defined herein shall have the meanings contained in the Plan.

PLEASE TAKE NOTICE that the estates of BlockFi Inc. and its debtor affiliates (collectively, "BlockFi" or the "Wind-Down Debtors"), by and through its undersigned counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 for entry of an order substantially in the form submitted herewith, authorizing the Wind-Down Debtors to redact and file under seal Schedule 1 to Exhibit A (the "Motion to Seal") to the Wind-Down Debtors' Motion to Approve KYC/ALM Protocols for US-Based Accounts and further relief as the Court deems necessary, appropriate, and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion to Seal will be held on August 15, 2024 at 11:30 a.m. (ET) or as soon thereafter as counsel may be heard before Judge Kaplan at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8.

**PLEASE TAKE FURTHER NOTICE** that the Wind-Down Debtors will be relying on the Motion to Seal and that no brief is being filed since the legal basis upon which relief should be granted is set forth in the motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-2(a)(2), any objections must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Daniel M. Stolz, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received no later than August 8, 2024.

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested in the Motion to Seal may be granted without further notice.

Respectfully Submitted,

Dated: June 28, 2024 /s/ Susan S. Long

## **GENOVA BURNS LLC**

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Susan S. Long, Esq.
110 Allen Rd., Suite 304
Basking Ridge, NJ 07920
(973) 230-2095
DStolz@genovaburns.com
DClarke@genovaburns.com
SLong@genovaburns.com

Local Counsel to the Plan Administrator